

11 October 2013

The Rt Hon David Laws MP
Minister of State for Schools
Department for Education
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Dear Minister

Consultation on Primary Assessment and Accountability

I welcome the chance to offer Ofqual's views on your proposals for primary assessment and accountability under the new national curriculum.

We have responsibility for keeping under review and reporting on the standards of statutory assessments, which is why we are interested in your proposals for assessment. We expect assessments to be both valid (so that they measure what they are trying to measure) and reliable (so that the results are consistent). It is also important that assessments have clear purposes. This enables us to report on whether they are designed and delivered in a way that is fit for purpose. We would recommend that you set out the purposes of each of the assessments clearly, as you have with GCSEs and in particular how their use for accountability is balanced against other purposes.

Your proposals for accountability are also of great interest. As we have discussed in the past, accountability measures can have a significant bearing on the reliability of assessments and they should not assume a level of accuracy which the assessments cannot meet. Accountability measures which are not designed properly can introduce perverse behaviours. And assessments used for accountability need to be designed to be resilient, or they may be bent out of shape and not be fit for purpose.

As a general principle, the more measures that are used for accountability the better, so as not to put undue weight on individual measures and that is particularly important given the small cohort sizes in some primary schools. We therefore welcome your proposal to report a range of accountability measures and the plan to report three-year rolling averages alongside annual results, as proposed by Lord Bew. Experience shows that threshold measures can have perverse incentives, so we would encourage you to include an average point score attainment measure, as you suggest and to give it significant weight relative to the threshold measure. I would welcome the opportunity to join a discussion with Ofsted about their use of the new assessments alongside other evidence in future inspection judgements.

You propose the use of a scaled score for reporting performance in Key Stage 1 and 2 tests and comparing students against the national cohort by decile. Our recent consultation on reformed GCSEs sets out the arguments around scaled

scores and we rejected them there, but the arguments are different for primary assessments. There is a risk, though, that parents and others will assume that the use of scaled scores indicate a level of precision and reliability which no assessment, however well designed, could ever meet. When you report and use the results using scaled scores, we would recommend that you set out the levels of confidence that can be attached to them. There are various ways of doing this which we would be happy to discuss with you and with Ofsted.

There are also some significant technical challenges in designing assessments which can discriminate effectively and consistently across the attainment range so they can be reported at this level of precision. We would want to discuss with the Chief Executive of STA how Ofqual can both support and be reassured about the development of such assessments and I will invite Ofqual's Standards Advisory Group to consider the issues around assessment design. As part of our regulatory role, we would want to be able to provide public reassurance about the appropriateness of the use of scaled scores.

Finally, you make some significant proposals around baseline assessments to measure progress. There will be some challenges in putting in place such arrangements, but we believe these challenges can be overcome, so that valid and reliable assessment arrangements can be used for these purposes. We believe it will be essential to the success of your proposals to have a discussion with the teaching profession about how the fairness and consistency of the assessments can be secured as they are used in the classroom. We would be happy to be involved in those discussions.

If you decide, following your consultation, to go ahead with these proposals, we would recommend that a framework is developed for the design and delivery of any commercially-available assessment which could be used as a baseline. Assuming these assessments are to be statutory, we would have responsibility for reporting on them and we would want to discuss with you the details of this framework. It would need to cover issues such as the age-appropriateness of the assessments, their reliability and integrity and any arrangements for moderation and statistical checking of the results. We will also have an interest in how progress is calculated and how the results are used and reported, to the extent that these things impact on the validity of and confidence in the assessments.

I would of course be happy to discuss any of the points in this letter. I am copying it to Graham Stuart MP, as Chair of the Education Select Committee, to Sir Michael Wilshaw at Ofsted and to Ian Todd at the STA.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Glenys Stacey', with a stylized, flowing script.

Glenys Stacey